



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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March 21, 2003

BY E-MAIL, AND
FIRST CLASS U.S. MAIL

Stephen H. Bryant
Vice President, Regulatory and Government Policy
Bay State Gas Company
300 Friberg Parkway
Westborough, MA 01581-5039

Re: Bay State Gas Company, D.T.E. 03-10

Dear Mr. Bryant:

Enclosed is the Second Set of Information Requests by the Department of Telecommunications and Energy to Bay State Gas Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., March 19, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-10

**FIRST SET OF INFORMATION REQUESTS TO
BAY STATE GAS COMPANY**

The Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 SQ report filed on January 31, 2003 ("SQ Filing"), as supplemented on February 13, 2003 ("Supplement"). Please provide electronic versions of all calculation and worksheets together with your responses.
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than March 18, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the responses to Jody M. Stiefel, Hearing Officer, (2) copies to Glenn Shippee, Rates and Revenue Requirements Division, and four (4) copies to Alexander Kofitse, Gas Division.

Requests

DTE 2-1: Please refer to the Supplement, Section Two, at 2.

- (a) Recalculate the means and standard deviations shown in the table on Capital Spending History to exclude 2002 figures (i.e., recalculate the means and standard deviations for the period 1992- 2001).
- (b) Explain what the “Combined Mean” stands for.

DTE 2-2: Please refer to the Supplement, Section Two, at 3.

Recalculate the means and standard deviations shown in the table on “Unaccounted for Gas History” to exclude 2002 figures (i.e., recalculate the means and standard deviations for the period 1992- 2001).

DTE 2-3: Please refer to the Supplement, Section Two, at 4.

- (a) Recalculate the means and standard deviations shown in the table on “Staffing History” to include 1992 figures and excluding 2002 figures (i.e., recalculate the means and standard deviations for the period 1992- 2001).
- (b) Explain why Northern Utilities’ staffing history is included in Bay State’s SQI filing for 2002.
- (c) Define the term “temporary employees” in footnote 1; discuss the duties of the temporary employees; and provide figures for temporary employees by job category/job classification for the period 1992-2001.
- (d) Explain why the reported staffing levels ending 12/31/00 through 12/31/02 do not include employees who still work in New England and are now NiSource Corporate Service employees (footnote 2). Provide figures for these NiSource employees by job category/job classification and discuss how their inclusion or exclusion from the staffing levels data affects Bay State’s service quality.
- (e) Break down the staffing levels presented in the table on “Staffing History” by job category/job classification for the period 1992-2001 for both full-time and part-time workers.

- (f) Provide the ratio of customers to employees for the period 1992-2001. Using a line graph show the trend in the ratio of customers to employees for the period 1992-2001.

DTE 2-4: Please refer to the Supplement, Att. A, at 1-6.

- (a) In tabular and graphical forms show Bay State's total "Actual Capital Spending" (using line graphs where appropriate) for all expenditure categories combined. Also please show separately, in tabular and graphical forms, the following expenditure categories: (a) Growth, (b) Rentals, (c) Meter Work, (d) Replacements, (e) Other Operations, (f) Technology, and (g) Other General. Present your figures in nominal and real (i.e., constant) dollars for the period 1992 to 2001.
- (b) Based on the figures in DTE 2-4 (a), calculate the percentage of actual spending for each expenditure category ((a) - (g) above) to total local distribution company ("LDC") actual capital spending for each year from 1992 to 2001. Show the figures graphically using line graphs.
- (c) Based on the line graphs in (A) and (B) discuss the trend in the Company's actual capital spending for (i) total LDC capital spending and (ii) for each expenditure category listed above ((a) - (g)), for the period 1992 to 2001.